

DECLARATION OF JERMAINE CAMPBELL, 745168

I, Jermaine Campbell, under penalty of perjury, declare that the following is true and correct:

1. I am a prisoner housed at G. Robert Cotton Correctional Facility (JCF) in the Michigan Department of Corrections.
2. I have asthma and have been treated for asthma while housed in MDOC custody. Therefore, if I am exposed to COVID-19, it is very likely I could suffer severe medical complications.
3. Plaintiff Campbell lives in an 8-man style cube that is 20 feet by 10 feet. He sleeps within three feet away from three of my cube mates and he eat in the same area as other prisoners and cannot adhere to CDC standards for social distancing. I was given two (2) masks made out of state issued clothing. No replacement masks have been issued.
4. I am a parole violator and have served my minimum sentence. Therefore, I am parole eligible but have not been told when I will be released on parole. I am suffering from mental anguish, anxiety, and PTSD by not knowing if I will die or be exposed to COVID-19, or even when I may be released from Cotton Prison following the major flare up in here (with dozens infected) and some people dying. *See Exhibit 2.*

5. I am familiar with DOM 2020-29 or 30 (for COVID-19) issued by Director Washington. It is flagrantly being ignored by staff. For instance, Officer Dettloff was confirmed as having COVID-19 on April 18, 2010. Yet, although Dettloff has worked with Officer Divish and Officer Brown, they continued to come to our unit to work, and expose all of us in that unit to COVID-19, such as on April 20, 2010. We brought this to ARUS Parsons' attention, and she said these officers don't have to self-quarantine and told another inmate, in my presence, that he should not have come to prison and dying was basically part of life.
6. The attitudes of these prison staff are that they don't care whether inmates live or not. Confronted with such an attitude, I fear for my safety and whether I will live to see the future.

I have read the above declaration and find that it is true and accurate based on my observations and/or what staff has informed me.

I give permission to Counsel Daniel E. Manville to sign my name to this declaration due to the restriction placed on communications by prisoners with outside sources.

Date: 4-26-20

Signature: _____

Jermaine Campbell
w/permission *signed* *DK*